



Sarah Jenkins <sarah@shjenkinslaw.com>

FOIAs

Sarah Jenkins <sarah@shjenkinslaw.com>

Fri, Jan 7, 2022 at 6:44 AM

To: Cody Kees <ckees@bbpalaw.com>, Jay Bequette <jbequette@bbpalaw.com>, "Austin Porter, Jr. Esq." <aporte5640@aol.com>

Cc: Valerie Bailey <vbailey9741@pcssd.org>

Cody,

In good faith, we offered reasonable solutions for the volume of responsive documents to the three FOIA requests. On January 5, 2022, PCSSD committed to respond to FOIA #2 on Thursday, January 6, 2022 and did not. We suggested bracketed term searches for FOIA #1. We also recommended that FOIA #3, incorrectly labeled as #4, be processed before Ms. Bailey reviewed the documents in FOIA #1, given the likelihood of a low volume response rate. We committed to reviewing hard copies before scanning. We agreed to review unredacted documents in compliance with the Protective Order in this case and to wait for redacted copies of documents containing student-information. Nineteen hours after our response to your insisting on re-running all requests including FOIA #2, we have heard nothing from you.

Unless we receive PCSSD's response to FOIA #2 by 10 a.m. today and we agree, by 11 a.m. today, on rolling access to the remaining documents, we will file a motion to compel coupled with a request for expedited consideration.

Best regards,

Sarah

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